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Attorneys for Plaintiff, U.S. Bank N.A., as Trustee for the Certificateholders of Bear Stearns Asset-Backed Securities I Trust 2006-AC1, Asset-Backed Certificates, Series 2006-AC1

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

U.S. BANK, N.A., NOT INDIVIDUALLY
BUT SOLELY AS TRUSTEE FOR THE
HOLDERS OF THE BEAR STEARNS ASSET
BACKED SECURITIES I TRUST 2006-AC1,
ASSET-BACKED CERTIFICATES, SERIES
2006-AC1, a national association.

Case No.: 2:15-cv-01527-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

[SECOND REQUEST]

Plaintiff,

VS.

SFR INVESTMENTS POOL I, LLC, a
Domestic Limited Liability Company,

Defendant.

SFR INVESTMENTS POOL I, LLC, a Nevada

Limited Liability Company,

Counter/Cross-Claimant,

VS

U.S. BANK N.A., NOT INDIVIDUALLY BUT SOLELY AS TRUSTEE FOR THE HOLDERS OF THE BEAR STEARNS ASSET BACKED SECURITIES I TRUST 2006-AC1, ASSET BACKED CERTIFICATES, SERIES 2006-AC1, a national association; MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC., a Delaware Corporation, as nominee for UNIVERSAL AMERICAN MORTGAGE

1 COMPANY, LLC, a Florida Limited Liability
2 Company, its successors and assigns; and
3 VICHEARITH KHUON, an individual,

4
5 Counter/Cross-Defendants.

6
7 COMES NOW, Plaintiff, U.S. Bank N.A., as Trustee for the Certificateholders of Bear
8 Stearns Asset-Backed Securities I Trust 2006-AC1, Asset-Backed Certificates, Series 2006-AC1
9 (“U.S. Bank”), by and through its counsel of record, SFR Investments Pool 1, LLC, by and
through its counsel of record, and Mortgage Electronic Registration Systems, by and through its
counsel of record, hereby stipulates as follows:

10 **A. Discovery completed.**

11 The Parties have made disclosures of witnesses and documents pursuant to Fed. R. Civ.
12 P. 26. The depositions of SFR Investment Pool 1, LLC, the HOA, and U.S. Bank have been
13 conducted. The HOA and the HOA Trustee have produced documents pursuant to a subpoena
14 duces tecum.

15 **B. Discovery that remains to be completed.**

16 The deposition of the HOA Trustee has been noticed for January 25, 2018.

17 **C. Reasons why the deadline was not satisfied.**

18 The deposition of the HOA Trustee has been re-noticed various times to accommodate
19 the scheduling issues. The deposition is currently scheduled for January 25, 2018. The Court
20 has already entered an order allowing the deposition of the HOA Trustee after the discovery
21 deadline. See ECF No. 73. The current deadline for dispositive motions is set for January 22,
22 2018. Because the deposition of the HOA Trustee will not occur until January 25, 2018, it is
23 necessary for an extension on the dispositive motion deadline. The parties hereby stipulate and
24 agree that there is good cause for the extension and that the deadline be moved to February 5,
25 2018.

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1 **D. There is good cause to extend the discovery deadlines.**

2 LR 26-4 provides in pertinent part:

3 A motion or stipulation to extend any date set by the discovery plan, scheduling
4 order, or other order must, in addition to satisfying the requirements of LR IA 6-1,
5 be supported by a showing of good cause for the extension. A motion or
6 stipulation to extend a deadline set forth in a discovery plan must be received by
7 the court no later than 21 days before the expiration of the subject deadline. A
8 request made within 21 days of the subject deadline must be supported by a
9 showing of good cause. A request made after the expiration of the subject
10 deadline will not be granted unless the movant also demonstrates that the failure
11 to act was the result of excusable neglect.

12 Here, the instant Stipulation has been filed before the dispositive motion deadline, but
13 within 21 days of said deadline. However, there is good cause to extend the deadline because the
14 parties have had to re-notice the deposition of the HOA Trustee multiple times to accommodate
15 scheduling issues, and the deposition is currently scheduled for January 25, 2018, which is after
16 the dispositive motion deadline. Therefore, there is good cause to extend the dispositive motion
17 deadline to February 5, 2018.

18 **E. Proposed schedule for completing remaining discovery.**

19 The parties propose that the scheduling deadlines be modified as follows:

- 20 • Dispositive motions: **February 5, 2018.**

21 **IT IS SO STIPULATED.**

22 Dated this 19th day of January, 2018

23 WRIGHT, FINLAY & ZAK, LLP

24 /s/ *E. Daniel Kidd*

25 Dana Jonathan Nitz, Esq.

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31 *Attorneys for U.S. Bank N.A., as Trustee for
32 the Certificateholders of Bear Stearns Asset-
33 Backed Securities I Trust 2006-AC1, Asset-
34 Backed Certificates, Series 2006-AC1*

35 Dated this 19th day of January, 2018

36 KIM BILBERT EBON

37 /s/ *Diana S. Ebron*

38 Diana S. Ebron, Esq.

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44 *Attorneys for SFR Investment Pools 1, LLC*

1 Dated this 19th day of January, 2018

2 SNELL & WILMER L.L.P.

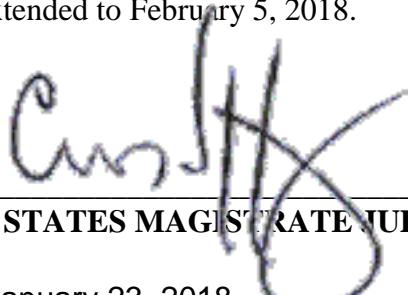
3 /s/ *Wayne Klomp*

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10 **ORDER**

11 Based on the foregoing Stipulation, and good cause appearing thereof, the Court hereby
12 orders that the dispositive motion deadline is extended to February 5, 2018.

13 **IT IS SO ORDERED.**

14 _____
15 
16 UNITED STATES MAGISTRATE JUDGE

17 Dated January 23, 2018